

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

x

DONALD PAPAY

Plaintiffs,

07 Civ-3858 (ROBINSON)

vs.

ECF Case

VIRGINIA HASELHUHN as ASSISTANT)
EXECUTIVE DIRECTOR, AMERICAN)
REGISTRY OF RADIOLOGIC)
TECHNOLOGISTS, RICHARD F. DAINES as)
COMMISSIONER, STATE OF NEW YORK)
DEPARTMENT OF HEALTH, ADELA)
SALAME-ALFIE as DIRECTOR, STATE OF)
NEW YORK DEPARTMENT OF)
HEALTH - - BUREAU OF)
ENVIRONMENTAL RADIATION)
PROTECTION (in his official capacity);)

Defendants,

x

DONALD PAPAY RULE 26(a)m INITIAL DISCLOSURES

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Plaintiffs Donald Papay hereby serves upon all Defendants the following initial disclosures based on the information currently and reasonably available to Plaintiffs Donald Papay reserves its right to supplement and change these disclosures as discovery proceeds.

A. Individuals Likely to Have Discoverable Information Supporting Plaintiff's Defenses

1. Plaintiff Donald Papay
128 Third Street
New City, NY 10956

Plaintiff Donald Papay has knowledge of the allegations and claimed damages set forth in the Complaint.

2. Virgina Haselhun
Assistant Director
American Registry of Radiologic Technologists
1255 Northland Drive
St. Paul, Minnesota 55120-1155

Virgina Haselhuhn works for American Registry of Radiologic Technologists as the Assistant Director and may knowledge of the allegations and claimed damages set forth in the Complaint
3. Richard F. Daines
New York Department of Health
Corning Tower
Empire State Plaza
Albany, New York 12237

Richard F. Daines works for State of New York Department of Health as the Commissioner and may knowledge of the allegations and claimed damages set forth in the Complaint.
4. Adela Salame-Alfie
New York Department of Health
Corning Tower
Empire State Plaza
Albany, New York 12237

Adela Salame-Alfie works for State of New York Department of Health as the Director and may knowledge of the allegations and claimed damages set forth in the Complaint.
5. Bureau of Environmental Radiation Protection
547 River Street
Flanigan Square, Room 530
Troy, NY 12180-2216

Bureau of Environmental Radiation Protection may knowledge of the allegations and claimed damages set forth in the Complaint.
6. Any employee of American Registry of Radiologic Technologists, Dorsey & Whitney, LLP, New York Department of Health, the Bureau of Environmental Radiation Protection, or the office of the Attorney General who may have knowledge relating to the allegations and claimed damages set forth in the complaint.

B. Documents Plaintiffs May Use to Support its Defenses


Plaintiffs refer Defendants to the attached documents, bates numbered 0001 through 0035.

C. Damages

Plaintiffs do allege damages at this time and reserve the right to do so.

D. Insurance

Upon information and belief, Defendants carry Errors and Omissions Policy.

/s/ 
Shmuel Klein (SK 7212) Fed Court Only
Law Office of Shmuel Klein, PC
Attorney for Plaintiff
268 ROUTE 59, Spring Valley, NY 10977
(845) 425- 2510

Dated: July 9, 2007
Spring Valley, New York